

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
Civil Action No. 7:15-CV-0038-BR

IAN S. GOTTLIEB)
As BIOLOGICAL FATHER and)
NEXT FRIEND OF GG AND JG,)
)
Petitioner,)
)
v.)
)
ERIC SCHNEIDERMAN, AG of)
NY STATE, HON. ELLEN)
GESMER, SUPREME COURT OF)
NEW YORK COUNTY JUSTICE,)
ERICA F. GOTTLIEB,)
)
)
Respondents.)

**REPLY DECLARATION OF MICHELLE R. LAMBERT IN SUPPORT OF
STATE RESPONDENTS' MOTION TO DISMISS**

MICHELLE R. LAMBERT declares under penalty of perjury and in accordance with 28 U.S.C. § 1746 as follows:


1. I am an Assistant Attorney General in the Office of Eric T. Schneiderman, Attorney General of the State of New York, attorney for State Respondents, the Honorable Ellen Gesmer, a Justice of the Supreme Court of the State of New York, and Eric T. Schneiderman, Attorney General of the State of New York. I submit this reply declaration in support of State Respondents' Motion to Dismiss Petitioners' Petition for a Writ of Habeas Corpus and Petition for a Declaratory Judgment Pursuant to 28 U.S.C. §§ 2201, 2202 pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure.

2. Annexed hereto as Exhibit G is a true and correct copy of a Preliminary Conference Stipulation/Order, dated October 11, 2011, filed in the case of *Gottlieb v. Gottlieb*,

Index No. 312670/11, in the Supreme Court of the State of New York, New York County. This document has been redacted pursuant to Rule 5.2 of the Federal Rules of Civil Procedure.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
October 2, 2015



Michelle R. Lambert

CERTIFICATE OF FILING AND SERVICE

I hereby certify that on October 2, 2015, I electronically filed the foregoing REPLY DECLARATION OF MICHELLE R. LAMBERT IN SUPPORT OF STATE RESPONDENTS' MOTION TO DISMISS on behalf the Honorable Ellen Gesmer, a Justice of the New York State Supreme Court, New York County, and Eric T. Schneiderman, Attorney General of the State of New York, with the Clerk of Court using the CM/ECF system, served a copy via the CM/ECF system on counsel for Respondent Erica Gottlieb, and served a copy on the Pro Se party by depositing a copy in the United States Mail addressed as follows:

Ian S. Gottlieb
796 Washington Acres Road
Hampstead, NC 28443
Pro se

ERIC T. SCHNEIDERMAN
Attorney General of the State of New York

By: 

Michelle R. Lambert
Assistant Attorney General
120 Broadway, 24th Floor
New York, NY 10271
212-416-6023
Fax: 212-416-6009
Michelle.lambert@ag.ny.gov
N.Y. Reg. No. 466657
Attorney for State Respondents